

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

In re: )  
SUSIE MOORE, ) Case No. 14-22291-gmh  
Debtor. ) Chapter 13  
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**DEBTOR'S OBJECTION TO RENEWED MOTION TO DISMISS AS FILED BY  
TRUSTEE REBECCA GARCIA**

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The debtor, Susie Moore, by her attorneys, Nickolai & Poletti, LLC, by Anton B. Nickolai, for his objection to the renewed Motion to Dismiss as filed by Trustee Rebecca Garcia on December 21, 2015, alleges and states as follows:

1. The debtor will forward copies of her 2014 tax returns to the trustee forthwith.
2. The debtor will file an amended plan to provide for any tax refunds amount owed, but not yet paid, to the trustee, as well as to address any feasibility issues.
3. Accordingly, it is the position of the debtors that the trustee's Motion to Dismiss should be denied.

Wherefore, the debtor hereby respectfully requests that this Court deny the trustee's motion and further request that this Court set a hearing on the matter.

Dated: January 11, 2016.

Nickolai & Poletti, LLC  
Attorneys for Debtor

/s/ Anton B. Nickolai  
By: Anton B. Nickolai

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